

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JERUSALEM NY ENTERPRISES LLC

Plaintiff,

v.

HUBER ERECTORS & HOISTING, LLC, and
KAKEL MAINTENANCE & CONSTRUCTION,
and RICHARD T. LAUER, ESQ., and
LAUERLAW, LLC.

Defendants.

Case No. 21-cv-00376-MKB-CLP

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, all pleadings and papers on file in this action, and such other written and oral argument as may be presented, Plaintiff, Jerusalem NY Enterprises LLC (“JNE”) hereby moves this Court, before the Honorable Judge Margo K. Brodie, United States District Court, Eastern District of New York, Judge, at 225 Cadman Plaza E, Brooklyn, NY 11201, for an order remanding the case to Supreme Court of the State of New York, County of Kings pursuant to 28 U.S. Code § 1446 (b) (2) (a) and pursuant to CPLR 302 (3), or, alternatively, for an order directing limiting discovery as it pertains to establishing personal jurisdiction over defendants RICHARD T. LAUER, ESQ., and LAUERLAW, LLC.

Dated: Manhasset, New York
February 3, 2021

By: *Diana Rubin*
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